

## REMARKS

Reconsideration and further prosecution of the above-identified application are respectfully requested in view of the amendments, and the discussion that follows. Claims 1-4, 6-25, and 27-33 are pending in this application. Claims 1-4, 6-25, and 27-33 have been rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,665,395 to Busey et al. ("Busey") in view of U.S. Patent No. 6,771,765 to Crowther et al. ("Crowther"). Claims 7, 13, 19, 21, and 22 have been amended for clarification. After a careful review of the claims, it is believed that the claims are allowable and allowance is therefore respectfully requested.

All the pending claims have been rejected as being obvious over Busey in view of Crowther. Crowther discloses a queuing mechanism based upon agent skillsets. Media type is defined in the application as referring to the source or access channel over which the call is processed (p.4, 2<sup>nd</sup> para.) and as claimed is clearly distinguishable from the agent skills to which Crowther is addressed. The Examiner asserts that agent skills are not distinguishable from media type because agent skills are basically tied to the media type. The argument itself recognizes they are different. In fact, media type and skillsets are entirely different concepts. Skillsets concern agent attributes, and media type concerns attributes of a communication channel. As a consequence, Crowther concerns matching agent skills to requirements of calls while the invention concerns the opposite, matching media type (i.e. channel attributes) to agents. Since interrupt levels in Crowther are assigned to skillsets, they do not teach or suggest the exclusive or non-exclusive media types of the application, and there is no teaching to support applying the Crowther interrupt to the media types of the claims.

The Examiner has asserted that media type determines the type of request that needs to be handled by an agent with a particular skillset citing the example in Crowther of an agent logged into a telephone (col. 3, lines 60-67). However, that is merely an instance in which a specific agent is physically able to receive only telephone calls, not one in which the system determines the media type as exclusive or a non-exclusive, but rather defines the given agent as receiving exclusively telephone calls. This did not even prevent the agent from receiving other calls while handling the first. The Examiner


further asserts that Crowther (at col. 6, lines 55-56) teaches an interruptibility level of 1 for some calls which cannot be interrupted. However, this is a priority level attached to the agent's skills and not the media type. ("agent 330 is logged into...skill sets at priority levels p1."). Thus, interruptability levels in Crowther are based on agent skillsets, not media type. Thus, there is no teaching that supports applying interrupts to media types and no support for using interrupt levels of 1 for media type exclusivity. Accordingly, Busey and Crowther cannot be combined to render the independent claims 1, 13, 21 and 22 obvious. The Examiner has also asserted that the difference between media type and agents skills is irrelevant because the claims don't recite "skills." However, that is precisely the point, the claims recite "media type" which is distinguishable over the "agent skills" disclosed in the cited prior art. Further, the Examiner assumes that the exclusive media type is same as the highest interruptibility level, and the non-exclusive media type is the same as the lowest interruptibility level. However, this is not accurate. The media type concerns characteristics of the media channel, and is not an agent or agent skillset interruptibility level. Therefore, claims 1, 13, 21 and 22 are believed to be allowable for the above reason.

The remaining dependent claims 2-4, 6-12, 14-20, 23-25, and 27-33 depend on an allowable base claims and include additional, novel subject matter of the invention. Therefore, applicant believes that these claims are also allowable. In addition, with regard to claims 7, 8, and 13-33, which claim determining a metric of how many customers contact of the media type has been assigned, Busey does not teach this feature. The endpoint described at Col. 11, lines 15-67, is a single line and does not distinguish media type. Thus, Busey is not concerned with the maximum number of contacts of the media type but merely the maximum number of contacts. Therefore, claims 7, 8, and 33 are further distinguishable for this reason. Also transaction routing tables are not disclosed by Busey or Crowther and therefore claims 8-10, 13-21 and 29-31 are believed to be further distinguishable for this reason as well.

Allowance of claims 1-4, 6-25 and 27-33, as now presented is believed to be in order and such action is earnestly solicited. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, he is respectfully requested to telephone applicant's undersigned attorney.

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Respectfully submitted,  
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